



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT
Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 645-7100 (answers 24 hrs.)

March 5, 1990

CERTIFIED MAIL #P 051 052 254

Mr. Robert Gentry, Plant Manager
Deluxe Check Printers
P.O. Box 2852
Pittsburgh, PA 15230

Folder GEN AdmRec? N



RE: February 21, 1990 Inspection
Deluxe Check Printers
Robinson Township
Allegheny County
PAD002327930

Dear Mr. Gentry

This Notice of Violation is to confirm the findings of the Department's referenced inspection of your hazardous waste generator activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.450 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during the inspection are as follows:

1. Exception Reports have not yet been filed with the Department for two hazardous waste manifests (Documents #PAB5092426 and #PAB5307046), in violation of 25 Pa. Code §75.262(j).

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Towards this end, you are to submit to the Department by March 31, 1990 a proposed abatement program and schedule for correcting these violations. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this Notice of Violation or the conditions upon which the Notice of Violation is based. This Notice of Violation shall not be construed so as to waive or impair any rights of the Department of Environmental Resources heretofore or hereafter existing.

March 5, 1990

This Notice of Violation shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this Notice of Violation, please feel free to contact me at my office.

Sincerely,

David K. Waldorf
Solid Waste Specialist
Bureau of Waste Management
Southwestern Region

DKW:kld

cc: Central - Division of Compliance and Monitoring
EPA
Regional File
Chron File

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 2/21/90 Time start 12:30 PM Time finish 2:00 PM
 Name of inspector David Waldorf
 Company, installation name Deluxe Check Printers
 Location McMichael Rd.
 County Allegheny Municipality Robinson Twp
 Identification number PA002327930
 Name of responsible official Robert Gentry
 Title Plant Manager
 Mailing address PO Box 2552, P. H. B. Co., PA 15230
 Area code and telephone number (412) 788-2105
 Name of person interviewed - same - / John Zecchino
 Title - same - / Dept. Mgr.
 Mailing address (if different from above) - same -
 Area code and telephone number - same -

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☒ storage, ☐ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 986 kg./mo. (January, 1990)
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
0001, F002/3/5	Ashland Chemical Co.	Freedom PA STR
0001	Safety Kleen	West Mifflin, PA RRA

EPA

**Hazardous Waste Inspection Report
Comments - Part C**

Date of Inspection 2/21/90 Identification Number PAD002327930
Company, Installation Name Deluxe Check Printers
County Allegheny Municipality Robinson Twp

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

① This is a follow-up inspection to the Department's 11/2/89 inspection at this facility. As this facility has been renotified as a small quantity generator, no determinations were made regarding those regulations which no longer apply.

② Exception reports have not yet been filed for the two manifests cited in the Department's 11/2/89 inspection. Mr. Gentry advises that Ashland Chemical Co.* has no record of receipt of the waste manifested on M.D. # PAD 5042420 (215 gal, D001 1/27/88). A photocopy of the signed manifest M.D. # PAD 5307046 was obtained from Sattley Klean Corp.
*Shakopee, MN MND000686709

③ The drum of hazardous waste recovered by the Department at BFI landfill was manifested to Ashland. A copy of this manifest is attached.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) [Signature] Date 2-21-90
Inspector (signature) [Signature] Date 2/21/90

EPA

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 2/21/90 Identification Number PAD002327930
 Company, Installation Name Deluxe Check Printers
 County Allegheny Municipality Robinson Twp.

LAND DISPOSAL RESTRICTIONS COMMENTS

① Since the Department's last inspection at this facility (11/2/89), three shipments of restricted wastes have been made from this facility to Ashland Chemical Co. in Freedom PA. None of these shipments were accompanied by any L.D.R. Notifications / Certifications. These shipments are as follows:

M. D. #	Date	Waste	Quantity
PAC0089681	11/9/89	F002	220 gal
PAC1258445	1/23/90	F002	1680 lbs
PAC1258456	2/5/90	F002	1682 lbs
"	"	F002/3/5	280 lbs

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Person Interviewed (signature)

[Signature]
[Signature]

Date

2-21-90

Inspector (signature)

Date

2/21/90

Bureau of Waste Management
P. O. Box 8550
Harrisburg, PA 17105-8550

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS
AND CHEMOTHERAPEUTIC WASTE.

Form approved.
OMB No. 2050-0039
Expires 9-30-91

ER-SWM-51: REV. 12/88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law but is required by State law.	
		PA D002327930		90001			
3. Generator's Name and Mailing Address DELUXE CHECK PRINTERS P.O. box 2582 Pittsburgh, PA 15230-2852					A. State Manifest Document Number PAC 1286526		
4. Generator's Phone (412) 788-2105					B. State Gen. ID		
5. Transporter 1 Company Name Ashland Chemical Co.		6. US EPA ID Number PA D000797548		C. State Trans. ID PA-AH 0121			
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (412) 728-2500			
9. Designated Facility Name and Site Address Ashland Chemical Company 150 West 4th Ave. Freedom, PA 15042		10. US EPA ID Number PA D000797548		E. State Trans. ID PA-AH			
				F. Transporter's Phone ()			
				G. State Facility's ID			
				H. Facility's Phone (412) 728-2500			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers	13. Total Quantity	14. Unit	
				No.	Type	WL/Vol	
a. Waste Combustible CORROSIVE Liquid MOS Corrosive material UN 1760				001	DM	40 P	
b. R.C.R.A. - empty container Non-hazardous, non-regulated				002	DM	80 P	
c.							
d.							
J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code)				K. Handling Codes for Wastes Listed Above			
Lab Pack		Physical State		Lab Pack		Physical State	
a.		L		c.			
b. This waste is not a hazardous waste according to PA law.				a. 501			
				b. 501			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.							
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name				Signature		MONTH DAY YEAR	
John R. Zecchino				<i>John R. Zecchino</i>		12 14 90	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature		MONTH DAY YEAR	
Printed/Typed Name				Signature		MONTH DAY YEAR	
DAVID FRESHCORN				<i>David Freshcorn</i>		12 12 90	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		MONTH DAY YEAR	
Printed/Typed Name				Signature		MONTH DAY YEAR	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name				Signature		MONTH DAY YEAR	
John E. Throckmold				<i>John E. Throckmold</i>		10 11 90	

PA Form 8700-22 (Rev. 9/88) Previous editions are obsolete

Copy 5 - TSD Facility: Mail to Generator

Copy 8 - Generator: Retain this copy

EPA

PAC 1286526

SQG

(out)

HAZARDOUS WASTE DATA MANAGEMENT SYSTEM
MAINTENANCE FORM FOR NOTIFICATION

Lenn

EPA-ID # PA D0002327930Date: 12/7/89FACILITY NAME Deluxe Check Printers

New Facility Name

Contact Person/Position

(Last, First, M) Title Tel No 412, 788 2105MAILING ADDRESS Street Rd 5 Mc Michael Road
City _____ State Pa Zip 15205LOCATION ADDRESS Street 615 Mc Michael Road
City Pitt State Pa Zip 15205

County Name

County Code

Owner Name

Operator Name

Activity Code

2 --- Gen --- Tr --- Ted
 --- 5. Market or Burn HWF
 --- A. Gen Mark to Burn
 --- B. Other Marketer
 --- C. Burner

Used Oil Fuel Activities

--- 6. Off-Spec Used Oil Fuel
 --- A. Gen Mark to Burn
 --- B. Other Marketer
 --- C. Burner
 --- 7. Spec Used Oil Fuel Mark

Waste Fuel Burning: Type of Combustion Device

--- Utility Boiler --- Ind. Boiler --- Ind. Furnace

Mode of Transportation (Transporters Only)

--- Air --- Rail --- Highway --- Water --- Other

Maintenance Screens

W1 Card

Existing
Waste
Code

New
Waste
Code

F2 Card

Non-Reg Ind. (c303)

F001
~~F002~~
~~F003~~
 F005
 D001

Same Location Site



12/7/89
ctivity

Comments

Installation's EPA ID Number														Approved			Date Received (yr. mo. day)			
C												T/A	C							
F													1							

[illegible][illegible]

City or Town																State		ZIP Code					
C 4	P	I	T	T	S	B	U	R	G	H							P	A	1	5	2	3	0

[illegible]

City or Town																State		ZIP Code							
C 6	P	I	T	T	S	B	U	R	G	H									P	A	1	5	2	0	5

[illegible][illegible]

<input checked="" type="checkbox"/> 1a. Generator <input type="checkbox"/> 2. Transporter <input type="checkbox"/> 3. Treater/Storer/Disposer <input type="checkbox"/> 4. Underground Injection <input type="checkbox"/> 5. Market or Burn Hazardous Waste Fuel <i>(enter 'X' and mark appropriate boxes below)</i> <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner	<input checked="" type="checkbox"/> 1b. Less than 1,000 kg/mo. <input type="checkbox"/> 6. Off-Specification Used Oil Fuel <i>(enter 'X' and mark appropriate boxes below)</i> <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner <input type="checkbox"/> 7. Specification Used Oil Fuel Marketer <i>(or On site Burner)</i> Who First Claims the Oil Meets the Specification
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

☐ C. Industrial Furnace☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify) _____

☐ A. First Notification ☒ B. Subsequent Notification (*complete item C*)

C. Installation's EPA ID Number											
P	A	D	0	0	2	3	2	7	9	3	0

ID — For Official Use Only													
C												T/A	C
W													1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 0 2	F 0 0 3	F 0 0 5		
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous-waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1 Ignitable
(D001)


☐ 2 Corrosive
(D002)

☐ 3 Reactive
(D003)

☐ 4 Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature 	Name and Official Title (type or print) PLANT MANAGER	Date Signed 11/28/89
--------------------------------------------------------------------------------------------------	----------------------------------------------------------	-------------------------

EPA Form 8700-12 (Rev. 11-85) Reverse

RECEIVED
PA S

DEC 04 1989

EPA, R3

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

SUPPLEMENT TO U.S. EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY FORM (EPA Form 8700-12)

I. Installation's EPA I.D. Number

P A D 0 0 2 3 2 7 9 3 0

II. Name of Installation DELUXE CHECK PRINTERS

III. Location of Installation

ROBINSON TOWNSHIP

Municipality (Township, Borough, City)

ALLEGHENY

County

IV. IRS Employer Identification Number

4 1 - 0 2 1 6 8 0 0

V. SIC Codes (four-digit number in order of priority)

2 7 8 2

Specify:

GENERAL PRINTING & BINDING
FACILITY FOR BANK CHECKS
AND DEPOSIT SLIPS.

Specify:

Specify:

Specify:

VI. Type of Hazardous Waste Activity

- ☐ 1. Treater
☐ 2. Storer
☐ 3. Disposer
☐ 4. Reuse, Recycle, Reclaim
☐ 5. Permit by Rule

N/A

VII. Existing Environmental Permits

A. NPDES (Discharges to Surface Water)

B. UIC (Underground injection of fluids)

C. RCRA (Hazardous Waste)

D. PSD (Air Emissions from Proposed Sources)

E. Municipal Waste (As defined in Act 97)

F. Residual Waste (As defined in Act 97)

G. Permit by Rule

Name of POTW

POTW NPDES Number

H. Other

(Specify)

RECEIVED
PA SECTION

DEC 04 REC'D

EPA, R3

PAD002327930 Gen



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 645-7100 (answers 24 hrs.)

November 9, 1989

NOTICE OF VIOLATION

CERTIFIED MAIL #P 979 042 072

Mr. Robert Gentry
Plant Manager
Deluxe Check Printers, Inc.
McMichael Road
Pittsburgh, PA 15230

RE: Illegal Disposal of Hazardous Waste
BFI Imperial Landfill
Findlay Township
Allegheny County

Dear Mr. Gentry:

On September 15, 1989, during a routine municipal waste observation at BFI Sanitary Landfill, it was noted that at least one drum of marked hazardous waste had been disposed of at the landfill. Tracing of the drum through markings thereon, and through the load which contained the drum, indicated that this drum was from Deluxe Check Printers, Inc. in Robinson Township, Allegheny County (EPA Generator I.D. No. PAD002327930). Disposal of this drum of hazardous waste in this manner is in violation of the Pennsylvania Solid Waste Management Act (35 P.S. Section 6018), Sections 403(9), 610(6), 610(8)(i) and 610(9).

You are hereby notified of both the existence of this violation as well as the need to provide for its prompt correction. Towards this end, you are to submit to the Department by November 30, 1989 a proposed abatement program and schedule for correcting these violations. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this Notice of Violation or the conditions upon which the Notice of Violation is based. This Notice of Violation shall not be construed so as to waive or impair any rights of the Department of Environmental Resources heretofore or hereafter existing.

November 9, 1989

This Notice of Violation shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this Notice of Violation, please feel free to contact me at my office.

Sincerely,

David K. Waldorf
Solid Waste Specialist
Bureau of Waste Management
Southwestern Region

cc: Central - Division of Compliance and Monitoring
EPA
Regional File
Chron File

out

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 11/2/89 Time start 12:00 PM Time finish 2:30 PM
 Name of inspector David Waldorf
 Company, installation name Deluxe Check Printers
 Location McMichael Rd.
 County Allegheny Municipality Robinson Twp
 Identification number PAD002327930
 Name of responsible official Robert Ventry
 Title Plant Manager
 Mailing address P.O. Box 2852, Pittsburgh, PA 15230
 Area code and telephone number (412) 788-2105
 Name of person interviewed - Same -
 Title - Same -
 Mailing address (if different from above) - Same -
 Area code and telephone number - Same -

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 456 kg./mo. (3 qtrs. - 1989)
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D001, F002, F003 F005	Ashland Chemical Co	Freedom PA unknown
D001*	" " "	Shakopee MN unknown
D001	Satter, Klen Corp.	West Mifflin PA RRR
D001*	Ashland Chemical Co.	Kansas City, KS -unknown

* contains probable mis-identified F wastes.

Hazardous Waste Inspection Report
Generators - Part B

Deluxe Check Printers
PAD002327930
11/2/89

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
States				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
1				Hazardous waste determination, copies available		(b)
1				Identification number		(c)(1)
			(4)	Hazardous waste shipments offered only to licensed transporters		(c)(4)
1				Authorization received from TSD facility for wastes shipped off-site		(d)
1				PA manifest used for intrastate shipments		(e)(2)
			(4)	Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
			(4)	Manifests filled out properly and completely		(e)(7)
1				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
	3			Proper U.S. DOT shipping containers or packages		(f)(1)(i)
	3			Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
	3			Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
	3			Placards offered to transporter		(f)(2)
			(4)	Wastes accumulated on-site for less than 90 days		(g)(1)(i)
			(4)	Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
1				Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
			(4)	Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
1				Records retained at designated location for 20 years		(h)
			(4)	Quarterly reports submitted to the Department		(i)
			(4)	Exception reporting procedures followed		(j)
2				Hazardous waste disposal plan, if required		(l)
1				Spill reporting procedures followed		(m)(1)
	3			Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
2				Special requirements followed for international shipments		(o)
			(4)	On the job or classroom personnel training program [75.265(f)]		(g)(1)(6)
	3			Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report
Comments - Part C

Page 1 of 6

Date of Inspection 11/2/89 Identification Number PAD 002 327 930
Company, Installation Name Deluxe Check Printers
County Allegheny Municipality Robinson Twp.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

- ① This facility is a printing operation that prints individualized information only on check paper stock. Three hazardous waste streams were noted on site (in addition to a Saffey-Kleem Parts washer): a D001 Camer flush solution, an F002 111 TCE based wash solution and an F002/F003/F005 numbering machine cleaner.
- ② Violations of PA regulations noted during this inspection are as follows:
 - a.) Five shipments of hazardous waste were noted to have occurred from this facility using St. Joseph Motor Lines¹ as a Transporter, and one shipment of hazardous waste was noted to have been transported by P/E Nationwide². Neither of these firms are licensed to transport hazardous waste in Pennsylvania, and the use

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Person Interviewed (signature) -mailed to Mr. Gentry Date _____
Inspector (signature) [Signature] Date 11/6/89

R10

Hazardous Waste Inspection Report
Comments - Part C

Page 2 of 6

Date of Inspection 11/2/89 Identification Number PA002327930
Company, Installation Name Deluxe Check Printers
County Allegheny Municipality Robinson Twp.

(2) a.) contd.: of these firms is in violation of
25 PA Code 75.262 (c)(4).

('LAD042097261) ('FLD007922578)

b.) One shipment of hazardous waste from this facility to
Ashland Chemical Co. in Kansas City, KS was
noted to have occurred using a generic
EPA format hazardous waste manifest. Failure
to use a PA manifest for this shipment
is in violation of 25 PA Code 75.262 (e)(4).

c.) One shipment of hazardous waste from this facility to
Ashland Chemical Co. in Shakopee MN was noted
to have been accompanied by a PA manifest instead
of a MN manifest, in violation of 25 PA Code
75.262 (e)(3) ('PAB 5092426)

d.) The following information was noted to be missing
from hazardous waste manifests from this facility
to various TSD's in violation of 25 PA Code
75.262 (e)(7):

- i. - Transporter License # (4 manifests)
- ii. - Transporter phone # (1 manifest)
- iii. - total waste quantity (1 manifest)

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Person Interviewed (signature) - mailed to Mr. Gentry Date _____
Inspector (signature) [Signature] Date 11/6/89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 11/2/89 Identification Number DAD 002327930
Company, Installation Name Deluxe Check Printers
County Allegheny Municipality Robinson Twp.

- (2) contd. e.) One manifest (M.D. # PAB 5092426) used for the load of hazardous waste transported by PIE Nationwide listed Ashland Chemical Co.'s Transporter license number (PA-AH0121) for PIE Nationwide. Placement of this incorrect information on the manifest is in violation of 25 PA Code 75.262 (e)(7) and (e)(i).
- f.) One drum of hazardous waste was noted in storage in excess of 90 days, in violation of 25 PA Code 75.262 (g)(i)(i). At least one hazardous waste shipment has occurred from this facility since this drum's 7/14/89 accumulation date.
- g.) Three drums of hazardous waste in accumulation at the time of this inspection were noted without proper hazardous waste markings, in violation of 25 PA Code 75.262 (g)(i)(ii).
- h.) Three drums of hazardous waste in accumulation and one drum of hazardous waste in storage at the time of this inspection were without marked accumulation dates, in violation of 25 PA Code

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) -mailed to Mr. Gentry Date 11/6/89
Inspector (signature) [Signature] Date 11/6/89

R16

Hazardous Waste Inspection Report
Comments - Part C

Page 4 of 6

Date of Inspection 11/2/89 Identification Number PAD 002327930
Company, Installation Name Deluxe Check Printers
County Allegheny Municipality Robinson Twp

- ② h.) cont'd: 75.262(g)(1)(i).
- i.) Quarterly Reports are not being forwarded to the Department in violation of 25 PA Code 75.262(h).
- j.) Two hazardous waste manifests (PAB 5092426 and PAB 5307046, dated 1/27/88 and 11/7/88 respectively) were noted in this facility's files without signed return copies from the TSD (Ashland Chemical Co. - Shakopee MN and Setley-Kleen Corp). Failure to file an exception report for these manifests is in violation of 25 PA Code 75.262(j).
- k.) No employee hazardous waste training program was noted in place for this facility, in violation of 25 PA Code 75.262(g)(1)(v) and 75.265(f).

③ In all above statements, the term "drum" refers to a 55 gallon drum.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) mailed to Mr. Bentley Date _____
Inspector (signature) [Signature] Date 11/6/89

Hazardous Waste Inspection Report
Comments - Part C

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Date of Inspection 11/2/89 Identification Number PAD002327930
Company, Installation Name Deluxe Check Printers
County Allegheny Municipality Robinson Twp

- ④ Mr. Gentry and Mr. John Trinkala advise that, as of the time of this inspection, no results have been submitted by Pittsburgh Testing Laboratory for samples taken of the marked hazardous waste container from this facility which was delivered to BFI Imperial Sanitary Landfill for disposal on 9/14/89.
- ⑤ It appears from the hazardous waste generation rate observed that this facility may qualify for small quantity generator status. Notification forms for this purpose are attached to this inspection report. This facility should be cautioned, however, that to qualify for SQG status it must consistently remain below 1000 kg/year in generation. On site storage of hazardous waste in excess of 1000 kg prior to disposal will, if the facility renotifies as a SQG, negate SQG storage standards and full generator status requirements will apply.

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Person Interviewed (signature) -mailed to Mr. Gentry Date _____
Inspector (signature) [Signature] Date 11/6/89

Hazardous Waste Inspection Report
Comments - Part C

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Date of Inspection 11/2/89 Identification Number PADO02327930
Company, Installation Name Deluxe Check Printers
County Allegheny Municipality Robinson Twp

LAND DISPOSAL RESTRICTIONS COMMENTS

- ① Mr. Gentry advises that the chemicals used at this facility have not changed for at least the last several years. However, at least since 1/1/88 the only shipment of wastes other than D001 occurred on 9/29/89. This shipment ~~was~~ was manifested as F002, F002/F003/F005, and D001. Written hazardous waste determinations performed for Deluxe Check Printers by ~~by~~ Ashland Chemical Co. support these descriptions. This one shipment was noted to have attached the proper Notifications/Certifications for an F listed "hard hammer" waste.
- ② However on at least 6 previous occasions this same material was manifested as D001 hazardous waste with no LDR paperwork attached. In addition at least 5 shipments of D001 waste parts washer solvent to Saffey-Kleen Corp. have been made without notifications for LDR restrictions.

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son Interviewed (signature) - mailed to Mr. Gentry Date _____
ector (signature) [Signature] Date 11/1/89